

March 12, 2020

VIA ECF

Honorable Alvin K. Hellerstein, U.S. District Court Judge United States District Court, Southern District of New York United States Courthouse 500 Pearl Street New York, New York 10007

> Michael Dimas v. Francios Payard, LLC, et al. RE:

> > Civ. No. 18-cv-07873

Dear Judge Hellerstein:

We represent Plaintiff, Michael Dimas, in the above-referenced action. I write to Your Honor to request an extension of the date to submit the documentation necessary to substantiate Plaintiff's claimed damages per You Honor's recent order in Docket entry #67 of this matter. Plaintiff requests an extension of three (3) weeks from the current date of 3/13/2020 to 4/3/2020.

We make this request due to the disruption in our firm's business due to the outbreak of the COVID-19 coronavirus in New York City area. As a precautionary measure our firm's entire staff has transitioned to working from home as of yesterday, 3/11/2020. This abrupt and unexpected transition has prevented Plaintiff's counsel from being able to compile all of verified documents necessary to comply with You Honor's order.

Because of the disruption the coronavirus has caused in the City, I also respectfully request to be excused from delivering a hardcopy of this letter to the Courthouse at 500 Peal Street, as required in Your Honor's Individual Rules.

Thank you for your consideration in this matter.

Respectfully submitted,

Seamus P. Barrett, Esq.